

Deposition of Lawrence Zimmer - February 2, 2012
Volume I

1

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS
LIABILITY LITIGATION (No. VI) MDL Docket No. 875

AHNERT, et al. v. CBS CORPORATION, et al.
10-CV-67443

ANDERSON v. AW CHESTERTON COMPANY, et al.
11-CV-63499

BARKER v. ACANDS, INC., et al.
09-CV-60285

BAUMANN v. AW CHESTERTON COMPANY, et al.
11-CV-63517

BAYLOR v. ACANDS, INC., et al.
10-CV-62057

BIEGANSKI v. ACANDS, INC., et al.
09-CV-60498

BOLTON v. INC., ACANDS, et al.
09-CV-60186

BRAZZONI v. ACANDS, INC., et al.
11-CV-63501

BRESNAHAN, et al. v. ANCHOR PACKAGING CO., et al.
09-CV-60331

COGHLAN v. ACANDS, INC., et al.
10-CV-61461

DUFFEY v. ACANDS, INC., et al.
10-CV-61916

DUFFEY v. ACANDS, INC., et al.
11-CV-63495

EVERARD v. ACANDS, INC., et al.
09-CV-61353

FRISCH v. ACANDS, INC., et al.
09-CV-61354

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| <p>1 GOTTSACKER v. ACANDS, INC., et al. 10-CV-61885</p> <p>2 HAKES v. AW CHESTERTON COMPANY, et al. 10-CV-68063</p> <p>4 HANSEN v. ACANDS, INC., et al. 10-CV-62038</p> <p>5 HELD v. ACANDS, INC., et al. 10-CV-67814</p> <p>7 HOLCOMB v. ACANDS, INC., et al. 09-CV-61314</p> <p>8 IVERSON v. THE ANCHOR PACKING COMPANY, et al. 09-CV-60154</p> <p>10 JAKUBOWSKI v. ACANDS, INC., et al. 10-CV-67831</p> <p>11 JANICK v. ASBESTOS CLAIMS, et al. 10-CV-61426</p> <p>13 JOHNSON v. ANCHOR PACKING CO., et al. 09-CV-61599</p> <p>14 LINK, et al. v. ANCHOR PACKING CO., et al. 09-CV-60338</p> <p>16 MENGERT v. ACANDS, INC., et al. 09-CV-60501</p> <p>17 METZGER v. ACANDS, INC., et al. 09-CV-61322</p> <p>19 MICHELS v. ACANDS, INC., et al. 10-CV-62047</p> <p>20 MILLER v. ACANDS, INC., et al. 08-CV-89901</p> <p>22 MILLER v. A.P. GREEN INDUSTRIES, INC., et al. 09-CV-61040</p> <p>23 MILLER v. ACANDS, INC., et al. 09-CV-60519</p> <p>25</p> | <p>1 The Deposition of LAWRENCE ZIMMER, VOLUME I, a 2 witness in the above-entitled action, taken at the 3 instance of the Plaintiffs, pursuant to the Federal Rules 4 of Civil Procedure, pursuant to notice, before Christine 5 A. Kovac, RPR, Notary Public in and for the State of 6 Wisconsin, at COUNTRY HEARTH INN, 645 East Avenue, Lomira, 7 Wisconsin, on Thursday, February 2, 2012, commencing at 8 12:08 p.m. and concluding at 1:38 p.m.</p> <p>7 A P P E A R A N C E S</p> <p>8 CASCINO VAUGHAN LAW OFFICES, LTD, by 9 Mr. Ron Archer 10 220 South Ashland Avenue 11 Chicago, Illinois 60607 12 Appeared on behalf of the Plaintiffs.</p> <p>11 HEPLERBROOM LLC, by 12 Ms. Kaitlyn N. Chenevert 13 150 North Wacker Drive, Suite 3100 14 Chicago, Illinois 60606 15 Appeared on behalf of Georgia-Pacific in the 16 Anderson, Barker, Baumann, Baylor, Bieganski, 17 Bolton, Brazzoni, Coghlan, Duffey, Duffey, 18 Everard, Frisch, Gottsacker, Hakes, Hansen, 19 Held, Holcomb, Jakubowski, Janick, Mengert, 20 Metzger, Michels, Miller (08-CV-89901), Miller 21 (09-CV-60519, Nelson, Ploch, Reich, Repischak, 22 Risse, Scheffel, Strerath, Suhaysik, Wawiorka, 23 Zimmer, and Zunker cases.</p> <p>18 FOLEY & MANSFIELD, PLLP, by 19 Mr. Jacob D. Sawyer 20 55 West Monroe Street, Suite 3430 21 Chicago, Illinois 60603 22 Appeared on behalf of CBS CORPORATION.</p> <p>21 PETERSON, JOHNSON & MURRAY, S.C., by 22 Mr. J. Ryan Maloney 23 733 North Van Buren Street 24 Milwaukee, Wisconsin 53202 25 Appeared on behalf of Milwaukee Insulation in the Ahnert case only.</p> |
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| <p>1 NELSON v. ACANDS, INC., et al. 10-CV-61956</p> <p>2 PLOCH v. AW CHESTERTON COMPANY, et al. 09-CV-61435</p> <p>4 REICH v. ACANDS, INC., et al. 09-CV-60523</p> <p>5 REPISCHAK v. THE ANCHOR PACKING COMPANY, et al. 09-CV-61335</p> <p>6 RISSE v. ACANDS, INC., et al. 10-CV-67857</p> <p>8 SCHEFFEL v. PROCTOR & GAMBLE PAPER PRODUCTS, et al. 09-CV-60545</p> <p>10 SOUJA, et al. v. INC. OWENS-ILLINOIS, et al. 09-CV-60256</p> <p>11 STRERATH v. AW CHESTERTON COMPANY, et al. 11-CV-63496</p> <p>13 SUHAYSIK v. ACANDS, INC., et al. 10-CV-61865</p> <p>14 WAWIORKA v. ACANDS, INC., et al. 09-CV-60445</p> <p>16 ZIMMER v. ACANDS, INC., et al. 10-CV-61896</p> <p>17 ZUNKER v. ACANDS, INC., et al. 10-CV-67894</p> <p>19 ----- 20 Deposition of LAWRENCE ZIMMER, VOLUME I 21 Thursday, February 2, 2012 22 12:08 p.m. 23 24 at 25 COUNTRY HEARTH INN 645 East Avenue Lomira, Wisconsin Reported by Christine A. Kovac, RPR</p> | <p>1 APPEARANCES (Continued):</p> <p>2 GODFREY & KAHN, S.C., by 3 Ms. Erin M. Cook 4 780 North Water Street, Suite 1700 5 Milwaukee, Wisconsin 53202-3590 6 Appeared on behalf of Crane Company.</p> <p>5 CELBA LLC, by 6 Mr. Timothy D. Pagel 7 225 East Mason Street, 5th Floor 8 Milwaukee, Wisconsin 53202 9 Appeared on behalf of Foster Wheeler, LLC 10 in the Ahnert, Anderson (11-CV-63499), Baumann, 11 Duffey (10-CV-61916), Hakes, Iverson, Michels, 12 Scheffel, and Strerath cases only.</p> <p>13 LAVIN, O'NEIL, RICCI, CEDRONE & DISIPIO, by 14 Mr. Matthew H. Ruggles 15 190 North Independence Mall West, Suite 500 16 6th & Race Streets 17 Philadelphia, Pennsylvania 19106 18 Appeared telephonically on behalf of 19 3M Company.</p> <p>14 MARGOLIS EDELSTEIN, by 15 Mr. Mitchell S. Pinsly 16 The Curtis Center, Suite 400E 17 170 South Independence Mall W. 18 Philadelphia, Pennsylvania 19106 19 Appeared telephonically on behalf of 20 Metallo Gasket Company in the Michels case 21 only.</p> <p>18 FOLEY & MANSFIELD, PLLP, by 19 Mr. Stephen L. Wilson 20 250 Marquette Avenue, Suite 1200 21 Minneapolis, Minnesota 55401 22 Appeared telephonically on behalf of 23 Plastic Engineering Company in the 24 Duffey case only.</p> <p>22 JOHNSON & BELL, LTD., by 23 Ms. Lesley W. Shermeta 24 33 West Monroe Street, Suite 2700 25 Chicago, Illinois 60603 Appeared telephonically on behalf of Luse-Stevenson Company in the Hansen case only.</p> |

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1 APPEARANCES (Continued):

2 FOLEY & LARDNER, LLP, by
3 Mr. Daniel A. Manna
4 777 East Wisconsin Avenue, 40th Floor
5 Milwaukee, Wisconsin 53202-5300
6 Appeared telephonically on behalf of
7 Union Carbide.

8 DesROCHERS LAW OFFICES, LLC, by
9 Mr. Mark S. DesRochers
10 2800 East Enterprise Avenue
11 Appleton, Wisconsin 54913
12 Appeared telephonically on behalf of
13 USX Corporation f/k/a United States
14 Steel Corporation.

15 WILBRAHAM, LAWLER & BUBA, by
16 Ms. Mary F. Chicorelli
17 1818 Market Street, Suite 3100
18 Philadelphia, Pennsylvania 19103
19 Appeared telephonically on behalf of
20 IU North America and Nosroc Corporation
21 in the Baylor, Bieganski, Duffey, Hansen,
22 Held, Jakubowski, Michels, Risse, and Zunker
23 Cases. On behalf of Nosroc Corporation in
24 the Scheffel case.

25 Also present: Kay Zimmer

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1 I N D E X

2 EXAMINATION BY PAGE
3 Mr. Archer 10

8 E X H I B I T S

9 No. 1 Notice of Deposition 8
10 No. 2 Handwritten list of product names 34

11 (Exhibits were copied and attached to transcripts.)

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1 TRANSCRIPT OF PROCEEDINGS
2 (Exhibit No. 1 marked for identification.)
3 MS. CHENEVERT: This is Kaitlyn Chenevert
4 for Georgia-Pacific. I would just like to make a few
5 preliminary objections before the start of this
6 deposition. Georgia-Pacific objects to this
7 deposition going forward at this point on -- as there
8 has not been compliance with the deposition protocol.
9 There have been no responses to the standard
10 interrogatories or any product specific discovery
11 which has been served at this point. Georgia-Pacific
12 reserves the right to hold the deposition open to do
13 it at a later date after receipt of those answers to
14 interrogatories and request for production.

15 MR. ARCHER: We are on the record. This is
16 the Larry Zimmer deposition. This deposition is being
17 taken in the Zimmer case as well as several numerous
18 other cases. And they are all listed on Exhibit
19 Number 1, the notice of this deposition. The cases
20 are all venued in the United States District Court for
21 the Eastern District of Pennsylvania, MDL Docket
22 Number 875.

23 We are located at the Country Hearth Inn,
24 645 East Avenue, Lomira, Wisconsin, 53048. Phone
25 number here is 920-269-7477. Gramann Reporting is

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1 doing the reporting for this deposition, and they are
2 located at 710 North Plankinton Avenue, Number 710,
3 Milwaukee, Wisconsin, 53203. Phone number there is
4 414-272-7878.

5 I'm Ron Archer. I represent the plaintiffs
6 in all the cases, including Mr. Zimmer, and I'm also
7 the videographer for today's event. I'm with Cascino
8 Vaughn. We're at 220 South Ashland Avenue, Chicago,
9 Illinois, 60607. Phone number there is 312-944-0600.

10 For the video record will all attorneys
11 present and on the phone make their appearances and
12 who they represent?

13 MR. SAWYER: This is Jacob Sawyer on behalf
14 of CBS Corporation.

15 MS. CHENEVERT: This is Kaitlyn Chenevert
16 for Georgia-Pacific.

17 MR. MALONEY: Ryan Maloney for Milwaukee
18 Insulation.

19 MS. COOK: Erin Cook for Crane Co.

20 MR. PAGEL: Tim Pagel. My appearances will
21 appear on the written stenographic transcript.

22 MR. ARCHER: People on the phone?

23 MR. PINSLY: Mitchell Pinsly from Metallo
24 Gasket.

25 MS. SHERMETA: Lesley Shermeta for

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| <p>DEPOSITION OF LAWRENCE ZIMMER, Volume I, 2-2-12 Page 10</p> <p>1 Luse-Stevenson. 2 MR. WILSON: Steve Wilson for Plastic 3 Engineering Company. 4 MR. RUGGLES: Matt Ruggles for 3M Company. 5 MS. CHICORELLI: Mary Chicorelli for IU 6 North America and Nosroc Corporation. 7 MR. DesROCHERS: Mark DesRochers for USX. 8 MR. MANNA: Daniel Manna for Union Carbide. 9 LAWRENCE ZIMMER, called as a witness 10 herein, having been duly sworn on oath, was examined 11 and testified as follows: 12 E X A M I N A T I O N 13 BY MR. ARCHER: 14 Q. Good afternoon. 15 A. Good afternoon. 16 Q. Will you please introduce yourself to the members of 17 the jury? 18 A. I'm Larry Zimmer. 19 Q. How old are you? 20 A. 73. 21 Q. Where do you live? 22 A. Brownsville. 23 Q. Were you born and raised in Brownsville? 24 A. No. 25 Q. Where were you born and raised?</p> | <p>DEPOSITION OF LAWRENCE ZIMMER, Volume I, 2-2-12 Page 12</p> <p>1 A. We see them fairly often, yes. 2 Q. How close do your kids live to where you live? 3 A. Oh, one in Madison, two in Oshkosh, one in Waukesha, 4 one in Mukwonago. 5 Q. Are they fairly close so that you can see them pretty 6 often or no? 7 A. Yeah, we see them fairly often. 8 Q. I understand you're retired. Yeah? 9 A. Yes. 10 Q. What do you do nowadays that you're retired? 11 A. Not much. 12 Q. Why is that? 13 A. I can't. I don't have the stamina. I get tired 14 easily. 15 Q. We'll talk about your health a little bit later. 16 I understand you did serve in the military? 17 A. Yes. 18 MR. ARCHER: If you don't mind, would you 19 mute your phone? 20 Q. What branch? 21 A. Army. 22 Q. When did you serve? 23 A. '61. Six years. 24 Q. Where did you serve? 25 A. Fort Leonard Wood in San Antonio, Texas.</p> |
| <p>DEPOSITION OF LAWRENCE ZIMMER, Volume I, 2-2-12 Page 11</p> <p>1 A. Milwaukee. 2 Q. Is that where you went to school? 3 A. Yep. Pius XI. 4 Q. What's that? 5 A. Pius. 6 Q. Did you come from a big family, a lot of brothers and 7 sisters? 8 A. Yeah. There's 13 of us. 9 Q. Are you married? 10 A. Yes. 11 Q. What is your wife's name? 12 A. Kay. Kay. 13 Q. How long have you been married to Kay? 14 A. 50 years. Starting in '51. 15 Q. Do you have any children? 16 A. Got eight, four of each. 17 Q. How did you meet Kay? 18 A. Through my sister. 19 Q. How did that go about? 20 A. She told me she was -- she didn't have a boyfriend. 21 She was working at A & P. So I went there and asked 22 her out. She went out. And that was the beginning. 23 Q. Are you close with your family? 24 A. Am I close? 25 Q. Yeah. Do you see them often?</p> | <p>DEPOSITION OF LAWRENCE ZIMMER, Volume I, 2-2-12 Page 13</p> <p>1 Q. Were you honorably discharged? 2 A. Yes. 3 Q. What did you do for a living? Your work? Your trade? 4 A. Asbestos worker. 5 Q. When did you start doing that? 6 A. '57, late. 7 Q. Did you belong to a union? 8 A. Not at that time, not until '58. 9 Q. What local? 10 A. 19. 11 Q. Where is that out of? 12 A. Milwaukee. 13 Q. When did you finally retire? 14 A. '67. '97. '97. Sorry. 15 Q. You retired in '97? 16 A. I believe so. 17 Q. Not '67? 18 A. No. 19 Q. What does an insulator do? 20 A. Heats things, plumbing, heating, duct work, tanks, 21 refrigeration. 22 Q. Did you specialize in any one of those or just do all 23 of them? 24 A. No, I did all of them. 25 Q. What kinds of construction were you involved in during</p> |

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1 your working career? Industrial? Commercial?
 2 Residential?
 3 A. Commercial mostly. But I was in all of them.
 4 Q. What kind of projects did you work on? New
 5 construction? Remodel work? Shut-down work? Outage
 6 work?
 7 A. All of them.
 8 Q. What other trades regularly worked in your presence?
 9 A. All of them. Electricians, plumbers, fitters,
 10 drywall, ceiling tile, roofing.
 11 Q. What kinds of equipment or machinery did you work on
 12 during your working career?
 13 A. Turbines, boilers.
 14 Q. What's a turbine?
 15 A. It provides electricity.
 16 Q. Can you describe for us what a turbine looks like?
 17 A. Just a big motor.
 18 Q. How big?
 19 A. Huge.
 20 Q. Like stories tall or just 10 feet tall or what?
 21 A. No. It takes up a single floor.
 22 Q. Did you work on turbines?
 23 A. Yes.
 24 Q. Did you work around turbines?
 25 A. Yes.

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1 Q. Was it new construction or shut-down work or both?
 2 A. Just new.
 3 Q. Are you familiar with a power house called Point
 4 Beach?
 5 A. Yes.
 6 Q. What is it?
 7 A. What do you mean?
 8 Q. Have you ever been there?
 9 A. I was there.
 10 Q. What was going on while you were there?
 11 A. I was insulating the outside duct.
 12 Q. Were there turbines there, or was there a turbine
 13 there?
 14 A. There was a turbine there.
 15 Q. Was there work being done on it or no?
 16 A. Yeah. They had a fab shop making up blankets.
 17 Q. Describe that. What's the blanket? Or what are the
 18 blankets?
 19 A. Well, they're sewn together, and they're put on the
 20 turbine housing.
 21 Q. What do the blankets look like?
 22 A. Like a blanket with buttons.
 23 Q. With buttons?
 24 A. Yeah.
 25 Q. Is there anything inside the blankets?

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1 A. Yeah.
 2 Q. What?
 3 A. Insulation.
 4 Q. How big are these blankets you're describing?
 5 A. I believe they varied in sizes. Some took a couple
 6 guys to put it on, and some was just smaller pieces.
 7 Q. Were you present for the stuffing of the blankets?
 8 A. No. I never did that.
 9 Q. Were you present for it while it was going on out
 10 there --
 11 A. Yeah.
 12 Q. -- at Point Beach?
 13 What was that like?
 14 A. Dusty.
 15 Q. Describe that dust.
 16 A. It was just dusty. It kind of choked you off.
 17 Q. What's that?
 18 A. Choke you off.
 19 Q. Say that again?
 20 A. Choke you off.
 21 Q. Was it dust that you could see with your eyes?
 22 A. Yeah.
 23 Q. How big was the fab shop area?
 24 A. It was pretty much open.
 25 Q. Right. But how big was it?

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1 A. Didn't have any door. About as big as this room.
 2 Q. How big do you think this room is?
 3 A. 15 X 12.
 4 Q. Did the dust from the blanket fabrication -- is that
 5 what it was?
 6 A. Yeah.
 7 Q. Did the dust from the blanket fabrication fill the
 8 room, or was it just a little bit of dust over here
 9 right like in the corner somewhere? How would you
 10 describe it?
 11 MR. SAWYER: Objection, form.
 12 THE WITNESS: It was all over.
 13 BY MR. ARCHER:
 14 Q. Did you work in that dust yourself?
 15 A. Yeah. We had to clean up.
 16 Q. Did you breathe dust from that work, the blankets
 17 being fabricated?
 18 MR. SAWYER: Objection, form.
 19 THE WITNESS: Yeah.
 20 BY MR. ARCHER:
 21 Q. As an asbestos worker, would you be able to say
 22 whether or not those blankets had insulation that was
 23 asbestos containing in there?
 24 A. I would only assume so.
 25 Q. And why would you assume so?

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| DEPOSITION OF LAWRENCE ZIMMER, Volume I, 2-2-12 Page 18 | DEPOSITION OF LAWRENCE ZIMMER, Volume I, 2-2-12 Page 20 |
| <p>1 A. Because it --</p> <p>2 Q. Is that from your experience and your memory or some</p> <p>3 other way?</p> <p>4 MR. SAWYER: Objection, form.</p> <p>5 THE WITNESS: From memory.</p> <p>6 BY MR. ARCHER:</p> <p>7 Q. What about your memory tells you that that stuff was</p> <p>8 asbestos containing?</p> <p>9 A. Because it was so dusty, cut your air off.</p> <p>10 Q. At that point when you were at Stevens -- or at Point</p> <p>11 Beach, were you a mechanic?</p> <p>12 A. Yes.</p> <p>13 Q. Had you worked with all the different forms of</p> <p>14 insulation by that time?</p> <p>15 A. Yes.</p> <p>16 Q. Back in those days would you have been able to tell</p> <p>17 the difference between what was asbestos containing</p> <p>18 and not asbestos containing?</p> <p>19 A. At that time, yes.</p> <p>20 Q. So taking yourself back to that time, was that</p> <p>21 insulation for the blankets asbestos containing or</p> <p>22 not, based on what you're able to -- what your</p> <p>23 knowledge was then?</p> <p>24 A. Yes.</p> <p>25 Q. How close were you to the turbines being worked on</p> | <p>1 A. Sweeping up, cleaning up.</p> <p>2 Q. How did that create dust?</p> <p>3 A. Did you ever sweep a floor?</p> <p>4 Q. I've done it, but I've got to ask you.</p> <p>5 A. Well, just raised the dust up.</p> <p>6 Q. Was it dust that you could see with your eyes?</p> <p>7 A. Yeah.</p> <p>8 Q. Did you work in that dust?</p> <p>9 A. Yeah.</p> <p>10 Q. How long were you out there at Point Beach?</p> <p>11 A. A couple weeks.</p> <p>12 Q. When was this about during your career?</p> <p>13 A. '60 -- '68, '67.</p> <p>14 Q. So in the later '60's?</p> <p>15 A. Yeah.</p> <p>16 Q. Was there insulation actually going on to the turbines</p> <p>17 when you were out there?</p> <p>18 A. Yes.</p> <p>19 MR. SAWYER: Objection, form.</p> <p>20 BY MR. ARCHER:</p> <p>21 Q. What was that like?</p> <p>22 A. I didn't pay too much attention to it.</p> <p>23 Q. Well, if you didn't pay too much attention to it, does</p> <p>24 that mean you paid a little bit of attention to it?</p> <p>25 MR. SAWYER: Objection, form.</p> |
| DEPOSITION OF LAWRENCE ZIMMER, Volume I, 2-2-12 Page 19 | DEPOSITION OF LAWRENCE ZIMMER, Volume I, 2-2-12 Page 21 |
| <p>1 when you were doing your duct work?</p> <p>2 A. It was a floor above.</p> <p>3 Q. What kind of work by other trades was being done on</p> <p>4 the turbine or turbines? Was there more than one or</p> <p>5 just one?</p> <p>6 A. Yeah. No, there was more than one.</p> <p>7 It was pipe fitters. They were welders,</p> <p>8 fireproofing.</p> <p>9 Q. What was being done with the fireproofing?</p> <p>10 A. It would spray the beams.</p> <p>11 Q. That fireproofing go on wet?</p> <p>12 A. I imagine it was wet because it had to stick. When</p> <p>13 they blew it on, it would stick.</p> <p>14 Q. Was there dust created by other trades besides</p> <p>15 insulators out there?</p> <p>16 A. Yeah.</p> <p>17 Q. Like who?</p> <p>18 A. They had laborers.</p> <p>19 COURT REPORTER: I'm sorry. I didn't hear</p> <p>20 you.</p> <p>21 BY MR. ARCHER:</p> <p>22 Q. They had laborers did you say?</p> <p>23 A. Laborers.</p> <p>24 Q. What would the laborers do when they created dust, if</p> <p>25 they did?</p> | <p>1 THE WITNESS: Well, I knew it was in the</p> <p>2 dust. That was a problem.</p> <p>3 BY MR. ARCHER:</p> <p>4 Q. Well -- so was there dust from that process or not?</p> <p>5 A. Yes.</p> <p>6 Q. In -- was this dust from putting the insulation on the</p> <p>7 turbine or installing it?</p> <p>8 A. The only place I imagine it came from.</p> <p>9 Q. Did you work in that dust --</p> <p>10 A. Yes.</p> <p>11 Q. -- while you were out there?</p> <p>12 A. Yes.</p> <p>13 Q. Out of that two weeks, how much of the time were you</p> <p>14 working in the dust created by insulation on or around</p> <p>15 the turbine?</p> <p>16 MR. SAWYER: Objection, form.</p> <p>17 THE WITNESS: A long time.</p> <p>18 BY MR. ARCHER:</p> <p>19 Q. How about insulation from being in the fab shop, how</p> <p>20 much of that time were you in dusty working conditions</p> <p>21 from that?</p> <p>22 A. I would go through it every day a couple of times.</p> <p>23 Q. You started in late '57?</p> <p>24 A. Yeah.</p> <p>25 Q. Do you know about when in the late part of '57 you</p> |

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| <p>1 started? Was it in a certain month?</p> <p>2 A. No, I can't.</p> <p>3 Q. Was it snowing when you started?</p> <p>4 A. Yeah.</p> <p>5 Q. Who were you working for?</p> <p>6 A. L & S.</p> <p>7 Q. What insulation products did you work with while you</p> <p>8 were working at L & S?</p> <p>9 A. All of them.</p> <p>10 Q. What does that include?</p> <p>11 A. Kaylo, Pabco, and drywall, Gold Bond.</p> <p>12 Q. I'm asking you about insulation products -- insulation</p> <p>13 while you were at L & S.</p> <p>14 A. Well, it was Kaylo and Eagle-Picher.</p> <p>15 Q. Were there any brands of insulation products that you</p> <p>16 had worked with more while you were at L & S?</p> <p>17 A. Kaylo.</p> <p>18 Q. Why is that?</p> <p>19 A. That's what they put on a job.</p> <p>20 Q. How could you tell it was Kaylo?</p> <p>21 A. It said so on the box.</p> <p>22 Q. Do you remember specific places where you had worked</p> <p>23 with Kaylo when you first started at L & S?</p> <p>24 A. I worked it all. They had it on all the jobs -- all</p> <p>25 the steam piping and stuff.</p> | <p>1 it might be.</p> <p>2 A. Well, depending on the size of the pipe, you had to</p> <p>3 wire it on or band it on and then mud all the joints</p> <p>4 and then cover it with a cloth. And then later they</p> <p>5 would have plastic.</p> <p>6 Q. What would you do if you came to an elbow or a T on</p> <p>7 some piping when you're doing pipe insulation work?</p> <p>8 A. Well, the T with Eagle-Picher and then cover it with a</p> <p>9 finish coat of Mag, 85 Mag.</p> <p>10 Q. Did you have to cov -- cut insulation?</p> <p>11 A. Yes.</p> <p>12 Q. Why would you have to cut insulation?</p> <p>13 A. Because that's what the mechanic wanted.</p> <p>14 Q. How often would Kaylo insulation need to be cut?</p> <p>15 A. Daily.</p> <p>16 Q. I mean, was it an ongoing process during the day, or</p> <p>17 was it just a few times during the day?</p> <p>18 A. The job you had to have the boiler and the heating</p> <p>19 pipe. So you would cut and block, or cut and pipe,</p> <p>20 whichever it was needed.</p> <p>21 Q. What kind of tools did you fellows use --</p> <p>22 A. Saws.</p> <p>23 Q. -- to cut insulation?</p> <p>24 A. Saws.</p> <p>25 Q. What was that like when you were cutting insulation?</p> |
| DEPOSITION OF LAWRENCE ZIMMER, Volume I, 2-2-12 Page 23 | DEPOSITION OF LAWRENCE ZIMMER, Volume I, 2-2-12 Page 25 |
| <p>1 Q. Does that include 1957?</p> <p>2 A. Yes.</p> <p>3 Q. Does that include 1958?</p> <p>4 A. Yes.</p> <p>5 Q. Could you tell the difference between Kaylo pipe</p> <p>6 insulation and other brands of pipe insulation, say</p> <p>7 for instance Pabco?</p> <p>8 MR. MALONEY: Objection to foundation.</p> <p>9 THE WITNESS: It was white and smooth.</p> <p>10 BY MR. ARCHER:</p> <p>11 Q. What was white and smooth?</p> <p>12 A. Kaylo. You'd rub your hand on it and --</p> <p>13 Q. How much work with Kaylo did you do during the first</p> <p>14 say year or so of your work as an insulator or</p> <p>15 insulator helper?</p> <p>16 A. Quite a bit.</p> <p>17 Q. What is quite a bit? Would that be every day? Every</p> <p>18 week? Every month? What?</p> <p>19 A. It would be just about every day.</p> <p>20 Q. How did you all -- how did you fellows work with the</p> <p>21 Kaylo insulation?</p> <p>22 A. What do you mean?</p> <p>23 Q. Take us through the process of insulating,</p> <p>24 fabricating, whatever you're doing in order to install</p> <p>25 Kaylo on say a piece of pipe or a vessel or whatever</p> | <p>1 A. It was dusty.</p> <p>2 Q. What was it like when you were cutting Kaylo</p> <p>3 insulation?</p> <p>4 A. It was dusty.</p> <p>5 Q. Did it matter what brand it was whether it created</p> <p>6 dust or not?</p> <p>7 A. No.</p> <p>8 Q. Did you work in those dusty working conditions in the</p> <p>9 first part --</p> <p>10 A. Yes.</p> <p>11 Q. -- of your working career with Kaylo insulation?</p> <p>12 A. Yes.</p> <p>13 Q. Did you ever work at a place called Badger Ordinance?</p> <p>14 A. Yes.</p> <p>15 Q. When were you there?</p> <p>16 A. That was probably in '58.</p> <p>17 Q. Late '58?</p> <p>18 A. Yeah.</p> <p>19 Q. Was there any removal of insulation going on out there</p> <p>20 while you were there?</p> <p>21 A. There was.</p> <p>22 Q. Could you tell what brand of insulation was being</p> <p>23 removed, or can you tell us what brand of insulation</p> <p>24 was being removed out there?</p> <p>25 A. It was Kaylo.</p> |

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1 Q. How do you know?
 2 A. Because it was smooth and white.
 3 Q. Was this in late '58 this was happening?
 4 A. Yep.
 5 Q. Did that Kaylo insulation that was being removed
 6 appear to have been there for at least some time?
 7 A. Yes.
 8 Q. More than a year?
 9 A. That's why it was being replaced.
 10 Q. What was it like when the Kaylo insulation would be --
 11 was being removed out there at Badger Ordinance?
 12 MR. MALONEY: Object to form.
 13 THE WITNESS: It was dusty.
 14 BY MR. ARCHER:
 15 Q. Why was it dusty? Describe for us what would have
 16 created the dust.
 17 A. Because the Kaylo would stick to the pipe. And even
 18 if you took the piece off, the stuff would stick to
 19 it, and they would scrape that before you put new
 20 stuff on.
 21 Q. Did you do that work out there?
 22 A. No.
 23 Q. Did you help to remove the Kaylo?
 24 A. No, I did not. I was an apprentice then.
 25 Q. Were you --

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1 A. I wasn't allowed to touch tools.
 2 Q. Were you in the presence of that happening out there?
 3 A. Yes.
 4 Q. How close were you to that going on? Was this a
 5 matter of just feet, or was it yards, or was it miles?
 6 A. It was just feet.
 7 Q. Were you close enough that you were working in dusty
 8 working conditions from removing that Kaylo --
 9 A. Yes.
 10 Q. -- or not?
 11 A. I was.
 12 Q. How much of your work was commercial work?
 13 A. The majority.
 14 Q. Does that include in the 1960's and '70's?
 15 A. Yes.
 16 Q. Describe your work for commercial jobs.
 17 A. It was hectic.
 18 Q. What do you mean?
 19 A. Well, everybody was in there doing -- doing their job,
 20 and one guy would be -- be in the way of another, and
 21 then one -- like a plumber or fitter would be behind
 22 time, and he would throw his pipes up, and he wouldn't
 23 test them, and he would go ahead and cover them. But
 24 then he would have to rip some off because he had
 25 leaks. And it was always cleaning up around.

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1 Q. What is commercial work to you?
 2 A. Schools, office buildings, museum, gas company.
 3 Q. You mentioned working in the presence of drywallers --
 4 A. Yeah.
 5 Q. -- when we first started here. What do drywallers do?
 6 A. They put up drywall.
 7 Q. Did you work in the presence of drywallers?
 8 A. Oh, yes.
 9 Q. During the 1960's?
 10 A. Oh, yes.
 11 Q. And the 1970's?
 12 A. Yep.
 13 Q. Describe the process of working with drywall.
 14 MS. CHENEVERT: Object to form.
 15 THE WITNESS: Well, you had to try to keep
 16 ahead of the work.
 17 BY MR. ARCHER:
 18 Q. What I would like you to do is tell us what the
 19 process is, the steps from start to finish, involving
 20 drywall.
 21 A. They would put up the drywall, and then they would
 22 come and mix their bags of stuff, Gold Bond or
 23 whatever, and they would seal the joints and cover the
 24 -- where they put the screws in. And then they would
 25 sand it. And when they sanded it, it got dusty.

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1 Q. Did you observe the packaging of this material that
 2 they were sealing the joints with?
 3 A. Gold Bond.
 4 Q. Right. But did you observe the packaging of the --
 5 that material?
 6 A. Some was a bag, and some was in a five gallon bucket.
 7 It was GPS.
 8 Q. Are you familiar with the term joint compound?
 9 MS. CHENEVERT: Object to form, leading.
 10 THE WITNESS: Yeah.
 11 BY MR. ARCHER:
 12 Q. What's joint compound?
 13 A. It's what they do with drywall.
 14 Q. Is that the stuff that they put on the -- in the seams
 15 to --
 16 A. Yes.
 17 Q. -- smooth out the walls --
 18 A. Yes.
 19 MS. CHENEVERT: Object to form.
 20 BY MR. ARCHER:
 21 Q. -- or no?
 22 A. Yes.
 23 Q. What kind of tools did the drywallers use to sand the
 24 joint compound with?
 25 MS. CHENEVERT: Object to form, assumes

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1 facts.
 2 THE WITNESS: They had a board with the
 3 stuff on there, and they would take a flat trowel and
 4 put it on with that.
 5 BY MR. ARCHER:
 6 Q. All right. I'm talking about though the sanding of
 7 it.
 8 A. Oh, sanding.
 9 Q. Did they use tools to sand?
 10 A. They would have a stick with a sandpaper end, and
 11 they --
 12 Q. Like a pole sander?
 13 A. Yeah.
 14 Q. What was that like when they were sanding the joint
 15 compounds?
 16 MR. MALONEY: Object to form.
 17 THE WITNESS: It was dusty.
 18 BY MR. ARCHER:
 19 Q. Describe the dust.
 20 A. You could see it. And if you was in the room or where
 21 it was kind of closed off like this one would be, you
 22 would -- you would avoid if you had to until they were
 23 done.
 24 Q. Could you avoid it --
 25 A. Not all the time.

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1 Q. -- if you were in the room with them?
 2 MS. CHENEVERT: Object to form.
 3 THE WITNESS: Not all the time.
 4 BY MR. ARCHER:
 5 Q. Did the dust fill the rooms that this was going on
 6 in --
 7 A. Yes.
 8 Q. -- or did it just take up a little tiny area?
 9 MS. CHENEVERT: Object to form.
 10 THE WITNESS: No. It filled the room.
 11 BY MR. ARCHER:
 12 Q. Did you work in that kind of dusty working conditions?
 13 A. Yes.
 14 MS. CHENEVERT: Object to form, vague.
 15 BY MR. ARCHER:
 16 Q. When in your career did you observe drywall and
 17 drywall finishing work? Was it the early part of your
 18 career? The middle? Late? Somewhere in between?
 19 MS. CHENEVERT: Object to form.
 20 THE WITNESS: The whole time.
 21 BY MR. ARCHER:
 22 Q. All the way through?
 23 A. All the way through.
 24 Q. Does that include the 1960's?
 25 A. Yes.

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1 MS. CHENEVERT: Object to form.
 2 BY MR. ARCHER:
 3 Q. Does that include the 1970's?
 4 A. Yes.
 5 MS. CHENEVERT: Object to form.
 6 BY MR. ARCHER:
 7 Q. What brands of joint compounds do you recall? I know
 8 you mentioned Gold Bond before. Are there other
 9 brands?
 10 A. GPS. I don't know. If you showed me a list, I would
 11 probably remember.
 12 Q. Are there other brands that you don't recall?
 13 A. Yes.
 14 Q. Have you exhausted your memory as far as trying to
 15 think of other brands?
 16 A. Yeah. You would have to show me a list of names.
 17 Q. Do you think if I did show you a list, it would help
 18 you out?
 19 A. Yeah.
 20 MS. CHENEVERT: Object to --
 21 BY MR. ARCHER:
 22 Q. Take a look at this piece of paper and tell us if
 23 looking at this refreshes your recollection. I don't
 24 want you to read this off, but tell me -- tell us if
 25 it refreshes your recollection to look at that.

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1 MS. CHENEVERT: I'm going to object to
 2 improper refreshing of recollection.
 3 THE WITNESS: Yes.
 4 BY MR. ARCHER:
 5 Q. What brands?
 6 A. Gold Bond and the GPS and like --
 7 Q. Can you read your writing?
 8 A. I can't read my writing.
 9 Q. I knew it. Your writing is tiny; isn't it?
 10 A. Yes, it is.
 11 Q. Is this your writing on this piece of paper?
 12 A. Yes.
 13 Q. Is that today's date, which is Groundhog's Day --
 14 A. Yes.
 15 Q. -- 2012?
 16 A. Yes.
 17 Q. Is this your writing here with the tiny little letters
 18 on there?
 19 A. Yeah. That's my Parkinson's.
 20 Q. Well, if you think -- do you think if I gave you some
 21 names myself that that might refresh your
 22 recollection?
 23 MS. CHENEVERT: Object to the form.
 24 THE WITNESS: It might.
 25 BY MR. ARCHER:

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1 Q. Are you familiar with Georgia-Pacific?
 2 MS. CHENEVERT: Object to form, leading.
 3 THE WITNESS: Georgia-Pacific, yeah.
 4 MR. MALONEY: Before we proceed, I would
 5 like to mark the list that was presented to the
 6 witness as an exhibit and allow all defense counsel to
 7 take a look at the list as well.
 8 MR. ARCHER: Sure. And that's fine. That
 9 will happen. Actually, I'll have it marked.
 10 MR. MALONEY: Okay.
 11 MR. ARCHER: That was going to happen.
 12 MR. MALONEY: Okay. No problem. I just
 13 wanted to make sure.
 14 (Exhibit No. 2 marked for identification.)
 15 MR. ARCHER: And while I'm having this
 16 copied --
 17 MR. SAWYER: Well, I don't know that I need
 18 a copy. I just want to see what is says.
 19 MR. ARCHER: I'm going to make a copy.
 20 MS. CHENEVERT: I would like a copy.
 21 Anybody else?
 22 MR. MALONEY: Yeah.
 23 MS. COOK: Yes.
 24 MR. ARCHER: I'll just get everybody a copy.
 25 We'll go off the record -- we'll go off the record and

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1 -- it's 12:57.
 2 (A recess was held for lunch.)
 3 MR. ARCHER: We're back on the record. It's
 4 1:30. This is the Larry Zimmer deposition.
 5 MR. MALONEY: I just want to object to the
 6 videotaping of the deposition to the extent that it's
 7 not in compliance with the Federal Rules of Civil
 8 Procedure and also to use at trial.
 9 BY MR. ARCHER:
 10 Q. Are you familiar with USG?
 11 A. Yes.
 12 Q. What is that?
 13 A. Joint compound.
 14 Q. Were USG and Georgia-Pacific joint compounds used
 15 differently than you've described earlier --
 16 MS. CHENEVERT: Object to form.
 17 BY MR. ARCHER:
 18 Q. -- or not?
 19 A. No.
 20 Q. Did it matter which joint compound was being used
 21 whether or not it created dust when it was sanded?
 22 MS. CHENEVERT: Object to form, vague.
 23 THE WITNESS: It all created dust. If you
 24 sand it, there's going to be dust.
 25 BY MR. ARCHER:

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1 Q. Did you work in dust from those products?
 2 A. Yes.
 3 Q. And I'm talking about Gold Bond, USG, and
 4 Georgia-Pacific.
 5 MS. CHENEVERT: Object, compound.
 6 THE WITNESS: Yes.
 7 BY MR. ARCHER:
 8 Q. Would you be able to go back in time right now as you
 9 sit here today and tell us each and every place you
 10 ever saw Gold Bond and joint compound being used?
 11 A. No.
 12 Q. How about the same question for USG?
 13 A. Same.
 14 Q. How about the same question for Georgia-Pacific?
 15 A. Didn't see much of Georgia-Pacific.
 16 Q. I'm sorry?
 17 A. Didn't see much of Georgia-Pacific.
 18 Q. How would you know if Georgia-Pacific's products were
 19 on the job?
 20 A. It would be a bag or a five-gallon bucket.
 21 Q. And what about the bag or the five-gallon bucket told
 22 you that it was Georgia-Pacific?
 23 A. They had a triangle.
 24 Q. Anything else? Didn't have a name on there or
 25 anything?

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1 A. Oh, the name was on it, but it had that little
 2 triangle all the time.
 3 Q. Were any of the brands that you mentioned more popular
 4 than the others?
 5 A. I don't believe so. Maybe the first two, Gold Bond
 6 and GPS.
 7 Q. Is it GPS or USG?
 8 A. USG.
 9 Q. Did you ever see or observe any warnings about
 10 asbestos on joint compound packaging?
 11 MS. CHENEVERT: Object to form, vague.
 12 THE WITNESS: No.
 13 BY MR. ARCHER:
 14 Q. Did you ever observe warnings about asbestos on Kaylo
 15 packaging?
 16 A. No.
 17 Q. Did you ever receive any warnings at all of any kind
 18 about asbestos from Westinghouse?
 19 MR. SAWYER: Object to form.
 20 THE WITNESS: Westinghouse? No.
 21 BY MR. ARCHER:
 22 Q. Westinghouse. Do you know what Westinghouse is?
 23 A. A big company that made turbines and other things, but
 24 I don't know what.
 25 Q. How close would you be to work that involved sanding

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1 of joint compounds on walls? Would this be within
2 feet? Would it be yards? How far?
3 MS. CHENEVERT: Object to form, vague.
4 THE WITNESS: It would be both, both feet
5 and yards.
6 BY MR. ARCHER:
7 Q. Were you close enough to that work that you were in
8 dust from that or no?
9 A. Yes.
10 Q. How often was that?
11 A. Well, as often as they sand it, which was at least
12 once a week.
13 Q. What would be the most it would be? You said at least
14 once a week. How much would it be if it was a lot?
15 MS. CHENEVERT: Object to form.
16 THE WITNESS: Three days out of the week.
17 BY MR. ARCHER:
18 Q. Back when you were working with and around these
19 products that we've talked about today, did you expect
20 your work around these products and with these
21 products from dust --
22 A. No.
23 Q. -- to cause you harm?
24 A. No.
25 Q. Do you receive a pension?

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1 A. Yes.
2 Q. What is it? How much is it a month?
3 A. Roughly 1,500.
4 Q. How much is your social security a month?
5 A. About the same.
6 Q. Do you presently experience problems breathing?
7 A. Yes.
8 Q. Describe them.
9 A. Just sitting here, every once in a while I take a
10 sharp breath or a deep breath.
11 Q. Does that mean you're -- at that time you're short of
12 breath?
13 A. Yes. A little.
14 Q. Have any of your doctors told you that you have
15 asbestos-related problems?
16 A. Yes.
17 Q. What are your asbestos-related problems?
18 A. Asbestosis.
19 Q. Who's that doc?
20 A. Dr. Wilson.
21 Q. Do you right now have a present fear of some day
22 developing cancer or Mesothelioma from your exposure
23 to asbestos?
24 A. Yeah. I was told I would live to 99 if it didn't turn
25 cancerous, but odds aren't likely.

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1 Q. You mentioned Parkinson's before. How long have you
2 had Parkinson's?
3 A. Quite a while. About 12 years.
4 Q. What does that do to you?
5 A. Makes me shake.
6 Q. Yeah.
7 A. Lose balance. And just can't do a lot of stuff. Your
8 hands don't grab things right. You have to be
9 careful.
10 Q. How about your energy level?
11 A. That's almost nil.
12 Q. Is it tough doing this today?
13 A. Yeah. It's a job.
14 MR. ARCHER: Those are all the questions I
15 have for you for right now.
16 THE WITNESS: Okay.
17 MR. ARCHER: Thank you.
18 We're going to take a break here. 1:38.
19
20 (Deposition was adjourned for the day at 1:38 p.m.)
21
22
23
24
25

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1 STATE OF WISCONSIN)
2 MILWAUKEE COUNTY) ss
3 I, Christine Kovac, Registered Professional
4 Reporter and Notary Public in and for the State of
5 Wisconsin, do hereby certify that the deposition of
6 LAWRENCE ZIMMER, VOLUME I was recorded by me and reduced to
7 writing under my personal direction.
8 I further certify that said deposition was
9 taken at COUNTRY HEARTH INN, 645 East Avenue, Lomira,
10 Wisconsin, on the 2nd day of February, 2012, commencing at
11 12:08 p.m. and concluding at 1:38 p.m.
12 I further certify that I am not a relative or
13 employee or attorney or counsel of any of the parties, or
14 a relative or employee of such attorney or counsel, or
15 financially interested directly or indirectly in this
16 action.
17 In witness whereof, I have hereunto set my
18 hand and affixed my seal of office at Milwaukee,
19 Wisconsin, this 6th day of February, 2012.
20
21 Christine Kovac, RPR, and Notary Public
22 In and for the State of Wisconsin
23 My commission expires February 1, 2015.
24
25

| | | | | |
|----------|---|--|---|--|
| A | 9:8 assume (2) 17:24,25 assumes (1) 29:25 attention (3) 20:22,23,24 attorneys (1) 9:10 Avenue (3) 8:24;9:2,8 avoid (2) 30:22,24 | boilers (1) 14:13 Bond (8) 22:11;28:22;29:3; 32:8;33:6;36:3,10; 37:5 born (2) 10:23,25 both (3) 15:1;38:4,4 box (1) 22:21 boyfriend (1) 11:20 branch (1) 12:20 brand (3) 25:5,22,23 brands (8) 22:15;23:6;32:7,9, 12,15;33:5;37:3 break (1) 40:18 breath (3) 39:10,10,12 breathe (1) 17:16 breathing (1) 39:6 brothers (1) 11:6 Brownsville (2) 10:22,23 bucket (3) 29:6;36:20,21 buildings (1) 28:2 buttons (2) 15:22,23 | 8:18,19;9:6 cause (1) 38:23 CBS (1) 9:14 ceiling (1) 14:10 certain (1) 22:1 Chenevert (25) 8:3,3;9:15,15; 28:14;29:9,19,25; 31:2,9,14,19;32:1,5, 20;33:1,23;34:2,20; 35:16,22;36:5;37:11; 38:3,15 Chicago (1) 9:8 Chicorelli (2) 10:5,5 children (1) 11:15 Choke (2) 16:18,20 choked (1) 16:16 Civil (1) 35:7 clean (1) 17:15 cleaning (2) 20:1;27:25 close (9) 11:23,24;12:2,5; 18:25;27:4,7;37:25; 38:7 closed (1) 30:21 cloth (1) 24:4 Co (1) 9:19 coat (1) 24:9 Commercial (5) 14:1,3;27:12,16; 28:1 Company (4) 10:3,4;28:2;37:23 compliance (2) 8:8;35:7 compound (8) 29:8,12,24;35:13, 20;36:5,10;37:10 compounds (4) 30:15;32:7;35:14; 38:1 conditions (4) 21:20;25:8;27:8; 31:12 construction (3) 13:25;14:5;15:1 containing (5) 17:23;18:8,17,18,21 Cook (3) | 9:19,19;34:23 copied (1) 34:16 copy (4) 34:18,19,20,24 corner (1) 17:9 Corporation (2) 9:14;10:6 counsel (1) 34:6 Country (1) 8:23 couple (3) 16:5;20:11;21:22 Court (2) 8:20;19:19 cov (1) 24:10 cover (4) 24:4,8;27:23;28:23 Crane (1) 9:19 create (1) 20:2 created (7) 19:14,24;21:14; 25:5;26:16;35:21,23 cut (7) 18:9;24:10,12,14, 19,19,23 cutting (2) 24:25;25:2 |
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